## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

| UNITED STATES OF AMERICA | ) |             |
|--------------------------|---|-------------|
|                          | ) |             |
| v.                       | ) |             |
|                          | ) |             |
|                          | ) |             |
| RASHAWN ERIC MCEACHERN   | ) | 1:21-CR-418 |

## MOTION TO CONTINUE TRIAL

NOW COMES Defendant, by and through undersigned counsel, and moves the Court to continue this case from the February calendar. In support hereof, Defendant states the following:

- 1. Defendant is charged with multiple counts of possession of child pornography by indictment filed with this Court on December 13, 2022.
- 2. The parties have not yet agreed on the terms of a plea agreement. Counsel and Defendant require additional time to discuss Defendant's options and for Counsel and the United States to fully discuss a resolution of this matter. The undersigned's ability to discuss the discovery and other matters with Defendant have been hampered by COVID-19 and the need to meet virtually, which makes the sharing of discovery material extremely difficult.

3. Counsel has conferred with the Assistant United States Attorney in this matter, Ms. Kennedy Gates, and she has indicated that the United States has no objection.

WHEREFORE, Defendant respectfully requests that this matter be continued to the March calendar.

This the 27th day of January 2022.

/s/ Helen L. Parsonage Helen L. Parsonage North Carolina State Bar No. 35492 426 Old Salem Road Winston-Salem, NC 27101 (336) 724 2828 hparsonage@emplawfirm.com

## CERTIFICATE OF SERVICE

I, Helen L. Parsonage, do hereby certify that on this date I served a copy of the foregoing Motion to Continue Trial on the United States of America by using the CM/ECF filing system.

This the 27th day of January 2022.

/s/ HELEN L. PARSONAGE Attorney for Defendant 426 Old Salem Road0 Winston-Salem, NC 27101 (336) 724 2828 Email: hparsonage@epmlaw.com